

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

GESTURE TECHNOLOGY  
PARTNERS, LLC,

Plaintiff,

v.

LG ELECTRONICS, INC., LG  
ELECTRONICS USA, INC.,

Defendant.

Civil Action No. 2:21-cv-19234-JMV-JBC

***Filed Electronically***

**DECLARATION OF LIZA M. WALSH IN SUPPORT OF MOTION TO STAY  
PENDING *INTER PARTES* REVIEW**

I, Liza M. Walsh, declare as follows:

1. I am an attorney with Walsh Pizzi O'Reilly Falanga, LLP, counsel for Defendants LG Electronics, Inc. ("LGE") and LG Electronics USA, Inc. (LGE USA") (collectively, "LG") in connection with the above-captioned case.

2. I submit this Declaration in support of LG'S Motion to Stay Pending *Inter Partes* Review ("Motion to Stay").

3. Attached as Exhibit 1 to this declaration is a true and correct copy of the IPR petition filed by Apple, Inc. against the '079 patent, *Apple, Inc. v. Gesture Technology Partners, LLC*, IPR2021-00922 (May 18, 2021).

4. Attached as Exhibit 2 to this declaration is a true and correct copy of the IPR petition filed by Apple, Inc. against the '431 patent, *Apple, Inc. v. Gesture Technology Partners, LLC*, IPR 2021-00920 (May 21, 2021).

5. Attached as Exhibit 3 to this declaration is a true and correct copy of the

IPR petition filed by Apple, Inc. against the '924 Patent, *Apple, Inc. v. Gesture Technology Partners, LLC*, 2021-00923 (May 26, 2021).

6. Attached as Exhibit 4 to this declaration is a true and correct copy of the IPR petition filed by Apple, Inc. against '949 Patent, *Apple, Inc. v. Gesture Technology Partners, LLC*, IPR 2021-00921 (June 2, 2021)

7. Attached as Exhibit 5 to this declaration is a true and correct copy of Plaintiff's August 31, 2021 preliminary response to the IPR petition filed by Apple, Inc. against the '079 Patent.

8. Attached as Exhibit 6 to this declaration is a true and correct copy of Plaintiff's September 7, 2021 preliminary response to the IPR petition filed by Apple, Inc. against the '431 Patent.

9. Attached as Exhibit 7 to this declaration is a true and correct copy of Plaintiff's September 7, 2021 preliminary response to the IPR petition filed by Apple, Inc. against the '924 Patent.

10. Attached as Exhibit 8 to this declaration is a true and correct copy of Plaintiff's September 15, 2021 preliminary response to the IPR petition filed by Apple, Inc. against the '949 Patent.

11. Attached as Exhibit 9 to this declaration is a true and correct copy of LG's November 5, 2021 Motion for Joinder to Apple Inc's Inter Partes Review of the '079 Patent and LG's November 5, 2021 Petition of Inter Partes Review of the '079 Patent.

12. Attached as Exhibit 10 to this declaration is a true and correct copy of LG's November 5, 2021 Motion for Joinder to Apple Inc's Inter Partes Review of the '431 Patent and LG's November 5, 2021 Petition of Inter Partes Review of the '431 Patent.

13. Attached as Exhibit 11 to this declaration is a true and correct copy of LG's November 5, 2021 Motion for Joinder to Apple Inc's Inter Partes Review of the '924 Patent and LG's November 5, 2021 Petition of Inter Partes Review of the '924 Patent.

14. Attached as Exhibit 12 to this declaration is a true and correct copy of LG's November 5, 2021 Motion for Joinder to Apple Inc's Inter Partes Review of the '949 Patent and LG's November 5, 2021 Petition of Inter Partes Review of the '949 Patent.

15. Attached as Exhibit 13 to this declaration is a true and correct copy of third-party United Patents LLC's May 14, 2021 Petition of Inter Partes Review of claims 7-13 of the '431 patent.

16. Attached as Exhibit 14 to this declaration is a true and correct copy of Plaintiff's August 26, 2021 preliminary response to the IPR petition filed by United Patents, LLC's Petition for Inter Partes Review of claims 7-13 of the '431 Patent.

17. Attached as Exhibit 15 to this declaration is a true and correct copy of the United States Patent Trial and Appeal Board's November 22, 2021 Decision Granting Institution of Inter Partes Review of claims 7-13 of the '431 Patent.

I declare that the foregoing statements made by me are true.

Dated: November 24, 2021

Respectfully submitted,

s/ Liza M. Walsh  
Liza M. Walsh

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